

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

June 3, 2022

VIA EMAIL and ECF

Honorable Barbara Moses
United States Magistrate Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007
kevin_snell@nysd.uscourts.gov

**Re: USA v. Hernandez Yaneris
21 MAG 10939 (UA)**

Honorable Judge Moses:

With the consent of Pretrial Services and without objection from the Government, I write to request that the Court modify Ms. Hernandez's bail conditions by expanding her area of travel to include the District of New Jersey during the month of June 2022. Ms. Hernandez's stepdaughter is moving to the Dominican Republic later this summer. This modification will allow Ms. Hernandez to assist her stepdaughter in preparation for her move and to spend time together before she moves.

On November 16, 2021, Ms. Hernandez was released on a \$50,000 personal recognizance bond, signed by three financially responsible cosigners, with pretrial services supervision and travel restricted to the Southern and Eastern Districts of New York. Ms. Hernandez has been in full compliance with her bail conditions. Judge Lehrburger has granted several prior requests to travel, all of which have been completed without incident. Pretrial Officer Stephen Boose has indicated that he does not object to this request. AUSA Kevin Mea has indicated that the Government takes no position on the request for modification of the bail conditions.

Thank you for your consideration of this matter.

Respectfully submitted,
/s/

Jennifer Brown
Attorney in Charge
Federal Defenders of New York
(646) 763-1420

SO ORDERED:



HONORABLE BARBARA MOSES

6/8/22

cc: AUSA Kevin Mead